

## **TITLE I COMPARABILITY**

A local education agency (LEA) may receive Title I, Part A funds only if it uses state and local funds to provide services in project areas that are at least comparable to the services provided in school attendance areas that are not receiving Title I funds. This assurance is part of complying with the comparability requirement contained in Section 1120A, subsection (c) of Public Law 107-110, the Elementary and Secondary Education Act (ESEA), as amended by the No Child Left Behind Act of 2001. The LEA must have these items in place.

If the LEA selects all of its school attendance areas as project areas, the LEA must use state and local funds to provide services that are substantially comparable in each project area. This range must be between 90% and 110% of those services supplied to non-Title I schools. A state education agency (SEA) shall consider an LEA to have met the comparability requirement if the LEA.

1. Files with the SEA a written assurance that the district has established and implemented
  - a. a district-wide salary schedule,
  - b. a policy to ensure equivalence among schools in teachers, administrators and auxiliary personnel, and
  - c. a policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies,

AND

2. Establishes and implements other measures for determining and documenting compliance such as student/instructional staff ratios.

In addition to establishing the above policies, an LEA must develop procedures for compliance with the comparability requirement and implement those procedures annually. Federal statute specifies biennial documentation. However, OPI requires that this data be collected and submitted every year. This is the only way for us to assure ANNUAL compliance.

School districts fall into one of the following categories: (Districts and schools with an enrollment of less than 100 are excluded. Use the fall Annual Data Collection (ADC) to determine enrollment.)

**Please refer to the categories below to determine whether or not your district is required to do this report.**

### **Categories**

1. Only one school per level in the district.
2. Districts with more than one school per level; all schools eligible for Title I and all schools being served by Title I.
3. Districts with more than one school per level; all schools eligible for Title I, but only part of them being served by Title I.
4. Districts with more than one school per level; some schools eligible for Title I and some not eligible for Title I service.

**Process:** In Montana, each LEA must file a written assurance and keep records that it has established and implemented a district-wide salary schedule and policies to ensure equivalence among schools in staffing and in the provision of materials and supplies. The LEA must also establish and implement other measures for determining compliance with comparability such as student/instructional staff ratios and must maintain source documentation to support the calculations and documentation to demonstrate that any needed adjustments to staff assignments were made. The LEA must use data from the beginning of the school year. The LEA does not need to include unpredictable changes in student enrollment or personnel assignments that occur after the beginning of the school year.

The OPI has developed two spreadsheets for districts to use in determining comparability. However, districts may use one of their own as long as it is equivalent to the OPI formats. Both OPI spreadsheets can be downloaded, expanded if need be, completed, mailed or faxed back, or submitted electronically. Please do not use the old OPI format. If there are questions or assistance is needed, please telephone Clare Bridge, (406) 444-2080, and ask for the Title I specialist assigned to the project.

## **Instructions**

### **Spreadsheet Directions: Per Pupil Amount**

At the top of the spreadsheet, please fill in the proper headings. A separate spreadsheet must be completed for elementary schools, junior high/middle schools, and high schools. Then perform the following:

#### **Per Pupil Amount: Title I Schools**

1. List all the Title I schools in Column 1 under the appropriate heading.
2. Place the Non-federal salary amounts under Column 2. These dollars should be contributed only from state and local funds.
3. Enter the enrollment count from each school under Column 3.

The spreadsheet will automatically fill the amounts in Column 4, and under the headings of subtotals and averages.

#### **Per Pupil Amount: Non-Title I Schools**

1. List all the Non-Title I schools in Column 1 under the appropriate heading.
2. Place the Non-federal salary amounts under Column 2. These dollars should be contributed only from state and local funds.
3. Enter the enrollment count from each school under Column 3.

The spreadsheet will automatically fill in the amounts in Column 4, and under the headings of subtotals and averages. It will also calculate the 90% to 110% range to determine comparability.

Finally, fill the last column titled Comparable with the terms **yes** or **no**. After completing the spreadsheet, sign it electronically and submit the form, or print a copy, sign it, and fax or e-mail ([cbridge@mt.gov](mailto:cbridge@mt.gov)) to the OPI. The LEA must save a copy. **Comparability reports are due no later than October 30, 2010.**

**Spreadsheet Directions: Student/Staff Ratio**

At the top of the spreadsheet, please fill in the proper headings. A separate spreadsheet must be completed for elementary schools, junior high/middle schools, and high schools. Then perform the following:

**Student/Staff Ratio: Title I Schools**

1. List all the Title I schools in Column 1 under the appropriate heading.
2. Fill in the grade spans served in each school under Column 2. (You may have to type in the word grades, kindergarten, etc. to hold the numerical values.)
3. In Column 3 enter the enrollment count for each school.
4. In Columns 4, 5 and 6 enter the number of each applicable FTE. List the FTE of the instructional staff paid with state and local funds, by school, as of the beginning of this school year. Instructional staff is identified as those staff persons who have a direct effect on the student's educational program; e.g., teachers, aides, tutors, principals, instructional consultants, instructional librarians, and counselors. Clerical persons are not to be included. The FTE provided by state and local funds for bilingual education and the *FTE provided by supplemental state and local funds spent in any school attendance area or school for programs that meet the intent and purpose of Title I may be excluded*. Also, the excess costs of providing services to children with disabilities may be excluded. (Excess costs are costs of providing services to special education students that are over and above the average per pupil expenditure for all students, IDEA Part B; 34CFR 300.184.)

Columns 7 and 8 will automatically calculate the totals and the subtotals and averages.

**Student/Staff Ratio: Non-Title I Schools**

1. List all the Title I schools in Column 1 under the appropriate heading.
2. Fill in the grade spans served in each school under Column 2. (You may have to type in the word grades, kindergarten, etc. to hold the numerical values.)
3. In Column 3 enter the enrollment count for each school.
4. In Columns 4, 5 and 6 enter the number of FTEs. List the FTE of the instructional staff paid with state and local funds by school as of the beginning of this school year. Instructional staff is identified as those staff persons who have a direct effect on the student's educational program; e.g., teachers, aides, tutors, principals, instructional consultants, instructional librarians, and counselors. Clerical persons are not to be included. The FTE provided by state and local funds for bilingual education and the *FTE provided by supplemental state and local funds spent in any school attendance area or school for programs that meet the intent and purpose of Title I may be excluded*. Also, the excess costs of providing services to children with disabilities may be excluded. (Excess costs are costs of providing services to special education students that are over and above the average per pupil expenditure for all students, IDEA Part B; 34CFR 300.184.)

Columns 7 and 8 will automatically calculate the totals and the subtotals and averages, and it will compute the 90% to 110% range to determine comparability.

Finally, fill the last column titled Comparable with the terms **yes** or **no**. After completing the spreadsheet, sign it electronically and submit the form, or print a copy, sign it, and fax or e-mail ([cbridge@mt.gov](mailto:cbridge@mt.gov)) to the OPI. The LEA must save a copy. **Comparability reports are due no later than October 30, 2010.**

**Note:** The district may divide its schools into grade span groupings. Also, if there is a significant difference in the enrollments of schools within a grade span, for example, the largest school in the grade span has an enrollment that is two times the enrollment of the smallest school in the grade span; the LEA may divide grades spans into a large school group and a small school group.

Category 1 districts do not have to calculate comparability.

Category 2 districts will use the school(s) with the lowest percentage or numbers of children from low-income families as the non-project school(s).

Category 3 districts will use the school(s) eligible, but not being served as the non-project school(s).

Category 4 districts will use the school(s) eligible, but not being served plus the non-eligible school(s) as non-project school(s).